

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

MARY DOE parent and next of friend of  
JANE DOE, a minor in and for her own  
behalf and in their own right,

*Plaintiff*

v.

CITY OF PAWTUCKET, RHODE  
ISLAND, et al,

*Defendants*

C.A. No. 17-365-M-LDA

**EMERGENCY MOTION**  
**BY THE PLAINTIFFS**  
**TO ADJUDGE IN CONTEMPT,**  
**FOR SANCTIONS AND**  
**FOR THE EXTENSION OF TIME SPECIFIED**  
**IN THE PRE-TRIAL SCHEDULING ORDER**

NOW COMES the Plaintiffs, who hereby move this Honorable Court for an Order that the Defendants herein be adjudged in contempt of the Order of this Honorable Court, dated July 9, 2022, wherein it was Ordered that **“Defendants must produce all the documents requested in the subpoenas within seven days.”**

BEING in willful violation of this Order, and failing to produce the requested information, documentation and items within the seven days so allowed, Plaintiff requests that the Defendants be Ordered to provide the subpoenaed material forthwith, and to provide the same in hard copy format as has been done throughout this litigation, also that they found to be in Contempt, that Plaintiff be awarded a reasonable Attorney’s Fee for the prosecution of this Motion and for whatever additional remedy this court finds mete and just.

In support of Plaintiffs’ motion, they rely upon the Affidavit of George Patrick Hovarth, counsel for the Plaintiffs, filed herewith.

Furthermore, due to the continuing and ongoing obstructive actions on the part of the Defendants and their counsel, Plaintiffs move the Court once again address their request an extension of time for the completion of Factual Discovery, Expert Disclosures and Dispositive Motions in the Scheduling Order entered on March 16, 2022.

*Wherefore, Plaintiffs respectfully request that this Court grant an extension of the Pre-Trial Scheduling Order as follows:*

Factual Discovery to close by:	November 30, 2022
Plaintiff's Expert Disclosures shall be made by:	December 30, 2022
Defendant's Expert Disclosures shall be made by:	January 30, 2023
Expert Discovery to close by:	February 28, 2023
Dispositive Motions shall be filed by:	April 30, 2023

Dated this 17<sup>th</sup> day of July, 2022

Plaintiffs,  
By their attorney,  
/s/ George Patrick Hovarth  
George Patrick Hovarth (#5683)  
Law Offices of Hovarth & Hovarth  
75 Park Place, Pawtucket, RI 02860  
(401) 723-9010  
ghovarthesq@verizon.net

#### CERTIFICATION OF SERVICE

I hereby certify that the within document has been electronically filed with the Court on 6<sup>th</sup> day of July, 2022 and is available for viewing and downloading from the ECF system. The within document has been mailed, postage pre-paid, to Ryan Stys, Esquire and Marc DeSisto, Esquire, 60 Ship Street, Providence, RI 02903 and William J. Conley, Esquire, 123 Dyer Street, Providence, RI 02903

/s/ George Patrick Hovarth  
George Patrick Hovarth